UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAUNDRA G. ELION,	)	
	)	
Plaintiff,	)	
	)	**Civ. Action No. 05-0992 (PLF)**
v.	)	
	)	
ALPHONSO R. JACKSON,	)	
Secretary Of Housing And	)	
Urban Development,	)	
	)	
Defendant.	)	
	)	

PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff respectfully submits the following Initial Disclosures, pursuant to Rule 26(a), Fed. R. Civ. P.

Individuals

Individuals required to be identified in accordance with Rule 26(a)(1)(A), Fed. R. Civ. P., are identified below. Names of individuals followed by an asterisk ("*") are, to the knowledge of plaintiff and her counsel, employed by or reachable through the Department of Housing and Urban Development.

D. Michael Beard (*): Mr. Beard is a senior auditor who formerly served as the Regional Inspector General for Audit of HUD Region 6 and was reassigned to a previously non-existent, nonsupervisory position in the OIG Headquarters Office of Audit after filing an administrative complaint of discrimination against senior HUD OIG management. Mr. Beard has knowledge of the circumstances underlying his reassignment, the need for the reorganization which resulted in plaintiff's

reassignment, and the current duties and responsibilities of plaintiff.

Janet Bonds (*): Ms. Bonds is a Senior Auditor with HUD OIG and has knowledge of the discrimination, retaliation, and harassment that plaintiff suffered, as well as discriminatory and retaliatory actions by members of the Office of Audit toward others, including herself.

Edward R. Bowles (*): Mr. Bowles was formerly employed as Senior Auditor in HUD OIG and has knowledge of the discrimination, retaliation, and harassment that plaintiff suffered, as well as discriminatory and retaliatory actions by members of the Office of Audit toward others, including himself.

Latesha Campbell-Walters (*): Ms. Walters is a Management Analyst with HUD OIG and has knowledge of the discrimination, retaliation, and harassment that plaintiff suffered, as well as discriminatory and retaliatory actions by members of the Office of Audit toward others, including herself.

Saundra G. Elion: c/o Robert C. Seldon, Esq., 1319 F Street, N.W., Suite 305, Washington, D.C. 20004 (202) 955-6968: Ms. Elion is the plaintiff and has knowledge about all of the subjects of this action including, but not limited to, the discrimination and retaliation that she sustained as a result of defendant's actions, and the injury and emotional distress she sustained as a result.

Victor Elion: c/o Robert C. Seldon, Esq., 1319 F Street, N.W., Suite 305, Washington, D.C. 20004 (202) 955-6968: Mr. Elion is the husband of the plaintiff and has knowledge of the injury and emotional distress she sustained as a result of defendant's actions.

Donna Hawkins (*): Ms. Hawkins is plaintiff's former Assistant Director who was adversely affected by the same reorganization which resulted in plaintiff's involuntary reassignment. Ms. Hawkins was also reassigned after filing an EEO complaint against senior HUD OIG management, and has knowledge of the circumstances underlying her reassignment, the need for the reorganization which resulted in plaintiff's reassignment, and the current duties and responsibilities of plaintiff.

James A. Heist (*): Mr. Heist is the Assistant Inspector General for Audit and one of the three HUD OIG management officials responsible for the discrimination and retaliation toward plaintiff that is the subject of this action. Mr. Heist has knowledge of plaintiff's previous protected activity, the reorganization that resulted in plaintiff's involuntary reassignment, plaintiff's duties and responsibilities after her reassignment, defendant's failure to select plaintiff for a management level position after her reassignment, and the reassignments of other individuals under his supervision.

Agnes Proctor-Matthews (*):Ms. Proctor-Matthews has knowledge of the refusal of HUD OIG management to participate in ADR to resolve EEO complaints generally and as it affected plaintiff.

Michael Phelps (*): Mr. Phelps is the Deputy Assistant Inspector General for Audit and one of the three HUD OIG management officials responsible for the discrimination and retaliation toward plaintiff that is the subject of this action. Mr. Phelps has knowledge of plaintiff's previous protected activity, the

reorganization that resulted in plaintiff's involuntary reassignment, plaintiff's duties and responsibilities after her reassignment, defendant's failure to select plaintiff for a management level position after her reassignment, and the reassignments of other individuals under his supervision.

Daniel P. Salas (*): Mr. Salas formerly served as served as the Deputy Assistant Inspector General for Investigations, and was reassigned to a previously non-existent, nonsupervisory position in OIG Headquarters after filing an administrative complaint of discrimination against senior HUD OIG management. Mr. Salas has knowledge of the circumstances underlying his reassignment, and the defendant's use of involuntary reassignments.

Michael Stephens (*): Mr. Stephens is the Deputy Inspector General one of the three HUD OIG management officials responsible for the discrimination and retaliation toward plaintiff that is the subject of this action. Mr. Phelps has knowledge of plaintiff's previous protected activity, the reorganization that resulted in plaintiff's involuntary reassignment, plaintiff's duties and responsibilities after her reassignment, defendant's failure to select plaintiff for a management level position after her reassignment, and the reassignments of other individuals under his supervision.

Documents

Documents required to be disclosed in accordance with Rule 26(a)(1)(B), Fed. R. Civ. P., are as follows:

U.S. Department of Housing And Urban Development Report of Investigation, Complaint of Saundra G. Elion, No. IG-04-0403-67-00186 (March 16, 2005).

Letter to Agnes Proctor-Matthews (January 16, 2003).

Counseling and complaint file in plaintiff's previous administrative complaint, believed to be No. HQ 030070, commenced on or about December 18, 2004.

All of the foregoing documents are already in defendant's possession.

Calculation Of Damages

I. Backpay: Salary increases and awards denied plaintiff as a result of her reassignment to a make-work position without duties and responsibilities commensurate with her background and proven ability including, but not limited to, any such increases and awards received by the auditor noncompetitively assigned to a supervisory position as a Division Director in OIG Headquarters Office of Audit instead of plaintiff.

II. Compensatory Damages: In an amount not less than the statutory maximum under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §1981a, to compensate plaintiff for mental anguish, loss of enjoyment of life, social withdrawal, feelings of despair, and injury to plaintiff's career and professional standing and future professional opportunities.

Respectfully submitted,

Robert C. Seldon, Esq.
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Molly E. Buie, Esq.
D.C. Bar No. 483767
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By: _____
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this day of 28th October, 2005, I served a copy of the foregoing PLAINTIFF'S INITIAL DISCLOSURES by electronic mail upon:

AUSA John C. Truong
Office of the U.S. Attorney
Civil Division
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Washington, D.C. 20530
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Robert C. Seldon